

## James Brown

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**From:** Gerry Thompson [gat@alaskancopper.com]  
**Sent:** Tuesday, November 01, 2011 7:06 AM  
**To:** jim brown  
**Cc:** john souza  
**Subject:** Fw: Request for Additional Information re: EPA Inspection of 10/4/11.  
**Attachments:** Alaskan Copper Works - Chemical Table.docx; Alaskan Copper and Brass Company - Chemical Table.docx

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From: <Kirn.Graham@epamail.epa.gov>  
Sent: Monday, October 31, 2011 4:22 PM  
To: <gat@alaskancopper.com>  
Cc: <Davis.Tony@epamail.epa.gov>  
Subject: Request for Additional Information re: EPA Inspection of 10/4/11.

>  
> Hi Gerald,  
>  
> Tony was experiencing some IT issues with sending this email to you so  
> we decided to attempt sending it from my email address.  
>  
> Please direct your response and any questions directly to Tony using the  
> information provided in the body of the letter below.  
>  
> Via E-mail  
>  
> Gerald Thompson  
> Environmental Assistant  
> Alaskan Copper and Brass Company  
> Alaskan Copper Works  
> 628 South Hanford  
> Seattle, WA 98134  
>  
> Re: Request for Information  
>  
> The U.S. Environmental Protection Agency (EPA) conducted an  
> inspection of Alaskan Copper and Brass Company and Alaskan Copper  
> Works on October 4, 2011. The purpose of this inspection was to  
> determine if these two companies were in compliance with Section 313  
> of the Emergency Planning and Community Right-to-Know Act (EPCRA).  
>  
> During the inspection we requested copies of the two indexes of the  
> Material Safety Data Sheets (MSDS) for review. This information was  
> sent to EPA on October 6, 2011. We have completed our review of the  
> two indexes and would like to request additional information. We have  
> separated the requests for information for Alaskan Copper Works and  
> Alaskan Copper and Brass Company since we were informed at the time  
> of inspection that they were separate entities.  
>  
> Our evaluation of the MSDS indexes indicated that lead, copper,  
> nickel, chromium, methanol, ethylene glycol, and nitric acid may have  
> been manufactured, processed or otherwise used in amounts above the

> reporting thresholds established by EPCRA Section 313. For most  
> chemicals, the threshold amount is 25,000 pounds per year for  
> manufacturing or processing and 10,000 pounds for otherwise use. For  
> lead, the threshold for manufacturing, processing, and otherwise use  
> is 100 pounds per year. Please note that EPA requires that the total  
> weight of the chemicals used must be counted toward the appropriate  
> manufacturing, processing, or otherwise use threshold.  
>  
> Please provide copies of the MSDS for the chemicals listed in the  
> attached documents. Also please list, for the past five years on an  
> annual basis, the amounts of these chemicals that have been  
> manufactured, processed, or otherwise used, listed separately for the  
> two companies.  
>  
> Please note that the two sets of MSDS index sheets that we received  
> did not indicate which index belonged to which company. Our  
> examination led EPA to believe that the attached lists of chemicals  
> were applied correctly to the appropriate company. The common names  
> of the chemicals were copied as presented on the MSDS lists.  
>  
> Also, an examination of past EPA guidance regarding reporting to  
> EPCRA 313 did not find any reference to the procedure employed by  
> both companies of limiting threshold amounts of chemicals to the  
> "heat affected" area around the welds. Please examine any internal  
> documentation available to determine how this method of calculation  
> was determined. If you have any EPA guidance that speaks to this  
> calculation method, please provide a copy of that guidance as well.  
>  
> If you have questions or comments, please feel free to contact me by  
> phone at (206) 553-8322, by e-mail at [davis.tony@epa.gov](mailto:davis.tony@epa.gov), or in  
> writing to the address listed below.  
>  
> Thank you for your prompt attention to this matter.

Sincerely,

Anthony Davis, Inspector  
Inspection and Enforcement  
Management Unit

(See attached file: Alaskan  
Copper Works - Chemical Table.docx)(See  
attached file: Alaskan Copper and Brass  
Company - Chemical Table.docx)

> GRAHAM KIRN  
> EPA REGION 10  
> OFFICE OF COMPLIANCE AND ENFORCEMENT  
> 1200 6TH AVENUE, SUITE 900, OCE-164  
> SEATTLE, WA 98101  
> PHONE (206) 553-1603, FAX (206) 553-4743 [KIRN.GRAHAM@EPA.GOV](mailto:KIRN.GRAHAM@EPA.GOV)